

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: Randy Jay Spencer,	:	Case No. 24-10166-JCM
	:	
Debtor.	:	Chapter 13
	:	
Randy Jay Spencer,	:	
	:	Document No.:
Movant,	:	
	:	Related Document No.:
v.	:	
	:	Related Claim No.: 3
Galaxy Federal Credit Union,	:	
	:	
Respondent.	:	

**DEBTORS' OBJECTION TO PROOF OF CLAIM NO. 3**

AND NOW comes the Debtor, Randy Jay Spencer ("Debtor"), by and through his counsel, Brian C. Thompson, Esquire, Thompson Law Group, P.C., and hereby objects to Proof of Claim No. 3, filed by Galaxy Federal Credit Union ("Respondent"), as follows:

1. Movant is the Debtor in the above-captioned bankruptcy case.
2. On March 26, 2024, Debtor filed for protection under Chapter 13 of the Bankruptcy Code.
3. On May 9, 2024, Respondent filed Proof of Claim No. 3 listing \$94,576.30 as a secured claim. The claim is secured by property located at Parcel ID 08,001-073-000 5273 US 322 Franklin, PA 16323.
4. Debtor disputes and objects to the amount Respondent claims is owed.
5. Based upon the foregoing, Respondent's Claim should be disallowed in its entirety.

WHEREFORE, Debtor respectfully requests that Respondent's Proof of Claim No. 3 be disallowed in its entirety and such other relief as is just.

Dated: October 23, 2024

/s/Brian C. Thompson, Esquire

Brian C. Thompson  
PA ID: 91197  
Thompson Law Group, P.C.  
THOMPSON LAW GROUP, P.C.  
301 Smith Drive, Suite 6  
Cranberry Township, PA 16066  
(724) 799-8404 Telephone  
(724) 799-8409 Facsimile  
[bthompson@thompsonattorney.com](mailto:bthompson@thompsonattorney.com)